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9 **UNITED STATES DISTRICT COURT**
10 **WESTERN DISTRICT OF WASHINGTON**
11 **AT SEATTLE**

12 ELIZABETH PETERSON, AMANDA
13 CARLTON, REBECCA HIRSCH,
14 MICHELE O'DELL, and PRASANNA
15 RAMAKRISHNAN, individually and
16 on behalf of all others similarly
17 situated,

18 Plaintiffs,

19 v.

20 BSH HOME APPLIANCES
21 CORPORATION,

22 Defendant.
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Case No. 2:23-cv-00543-RAJ

**DECLARATION OF JULIE N.
GREEN REGARDING
EXECUTION OF NOTICE PLAN
AND ADMINISTRATION
PROCESS IN SUPPORT OF
MOTION FOR FINAL
APPROVAL OF CLASS ACTION
SETTLEMENT**

Date: June 13, 2024

Judge: Hon. Richard A. Jones

1 I, Julie N. Green, declare and state as follows:

2 1. I am the Senior Vice President of Operations, Class Action Services of
3 CPT Group, Inc. (“Settlement Administrator” or “CPT”). The following statements
4 are based on my personal knowledge, information provided to me by counsel for
5 Plaintiffs and by other CPT employees working on this matter, and records of CPT
6 generated and maintained in the usual course of its business. If called on to do so, I
7 could and would testify competently thereto.

8 2. CPT Group, Inc. is located at 50 Corporate Park, Irvine, CA 92606.

9 3. I have been employed by CPT for over 19 years, managing the operations
10 department and supervising multiple notice and claims administration programs. As
11 Senior Vice President of Operations, I am responsible for the oversight, supervision
12 and evaluation of all departments and positions related to the administration of class
13 action matters to ensure superior quality and successful execution of each component
14 required to complete the settlement process. In my career at CPT, I have been
15 responsible for the design and/or implementation of hundreds of class action
16 administration plans. I submit this declaration in support of the parties’ Motion for
17 Final Approval of Class Action Settlement and to attest to CPT’s compliance with the
18 Notice Plan as detailed in my declaration filed in support of preliminary approval
19 titled, Declaration of Julie N. Green Regarding the Notice Plan in Support of Motion
20 for Preliminary Approval of Class Action Settlement, dated December 8, 2023.

21 4. For this matter, CPT was charged with providing notice and claims
22 administration services as provided in the parties’ Class Action Settlement Agreement
23 and Release (“Settlement Agreement”), including but not limited to the following:

24 a. implementing the Notice Plan preliminarily approved by the Court
25 on January 25, 2024.

26 b. disseminating the Class Notice by email to all Settlement Class
27 Members for whom Defendant provided an email address.
28

- c. mailing the Class Notice to Settlement Class Members without a valid email address or whose email notice was undeliverable.
- d. executing the supplemental notice plan through programmatic display, social media, and paid search to target potential Settlement Class Members through online digital marketing and advertising.
- e. disseminating a nationwide informational press release on PR Newswire US1 National Newswire.
- f. establishing a dedicated settlement website that includes links to Court-approved documents, allows online submission of claims, and provides up-to-date information regarding the case.
- g. reviewing and determining the validity of submitted claim forms, and requesting additional information, if warranted.
- h. following up with claimants who submit deficient claims.
- i. receiving and processing other communications about the Settlement such as questions about the claims process, requests for exclusion or objections.
- j. preparing reports and summaries regarding the notice and claims process for the Parties and the Court; and
- k. performing such other tasks as set forth in the Settlement Agreement, or as the Parties mutually agree to or that the Court orders.

CAFA NOTICE

5. On December 18, 2023, in compliance with the Class Action Fairness Act of 2005, 28 U.S.C. § 1715(b), CPT sent notification to the United States Attorney General, and the Attorney Generals in all states and territories.

QUALIFIED SETTLEMENT FUND

6. Following entry of the Order Granting Preliminary Approval, CPT established a Qualified Settlement Fund (“QSF”) and corresponding bank account to receive the settlement funds. In accordance with the section IV. of the Settlement Agreement, on March 5, 2024, Defendant transmitted the immediate notice costs (\$66,245.83) to CPT via wire transfer. Subsequently, on March 8, 2024, CPT issued itself payment for applicable Notice and Administration costs incurred to-date in the amount of \$66,245.83.

DATA ANALYSIS FOR DIRECT NOTICE

7. On February 16, 2024, CPT received from Defense Counsel the first set of data files containing the name, contact information, and product information for Settlement Class Members known to Defendant (herein referred to as “Known Settlement Class Members”). The file contained 16,474 records. On February 29, 2024, CPT received a second set of data files containing the name, contact information, and product information for Known Settlement Class Members. The second file contained 20,629 records. In total, the two data files contained 37,103. CPT assigned a unique ID to each record to be used for tracking purposes throughout the course of administration. In addition, CPT reviewed the data files and scrubbed for anomalies and duplicates. Following these steps, 22,443 records were identified and removed during the scrubbing process as follows: a) 7,556 had non-US addresses and did not meet the class definition; b) 10,609 were true duplicates based on same name, address, and product information; and c) 4,278 had blank or incomplete name and address. As a result, the final list consisted of 14,660 Known Settlement Class Members.

TOLL-FREE NUMBER

8. CPT established and has maintained a case-specific 24-hour toll-free telephone number (1-888-919-4128) that went live on March 7, 2024. Calls received during business hours (9:00 a.m. to 5:30 p.m. PST, Monday through Friday) are

1 prompted through the interactive voice recognition ("IVR") FAQs and given an
2 opportunity to speak with a live representative. Calls received outside business hours
3 are provided the FAQs and given the option of leaving a voicemail. This toll-free
4 telephone number is listed in several locations of the Settlement Website, including
5 the footer and Contact-Us page. As of the date of this declaration, the case support
6 line has answered or responded to a total of 142 calls.

7 8 **CASE-SPECIFIC EMAIL ADDRESS**

9 9. In addition to the telephone support line, CPT established a dedicated
10 case email (BSH-VFDSettlement@cptgroup.com) and inbox. The email address is
11 listed in several locations on the Settlement Website, including the footer and Contact-
12 Us page. Potential Settlement Class Members can use this email to communicate with
13 CPT if they have questions about the case. As of the date of this declaration, there
14 have been 81 email inquiries received and responded to in the case email inbox.

15 **SETTLEMENT WEBSITE**

16 10. CPT also established a dedicated settlement website (www.BSH-
17 VFDSettlement.com) that went live on March 7, 2024. This website serves as a central
18 hub for pertinent settlement information and resources. Notably, it provides links to
19 access and view essential case documents, including the Settlement Agreement,
20 Preliminary Approval Order, and Class Notice. To facilitate an efficient and
21 streamlined claim process, the website is designed to enable claims to be filed
22 electronically during the active notice and claims period (between March 7, 2024, and
23 February 12, 2025). Visitors to the site have the option of filing a claim form via two
24 routes. Known Class Members are prompted to enter the online passcode indicated
25 on their Summary Notice received by mail or email. Those who learn of the case
26 through publication ("Unknown Class Members") are prompted to file an open-to-
27 the-public claim form. As of the date of this declaration, in aggregate, there have been
28

1 approximately 44,620 views of the websites' pages, and 15,416 unique visitors to the
2 site. A true and correct copy of the Long Form Class Notice posted to the website and
3 online Claim Form(s) are attached hereto as **Exhibit A, B and C**, respectively.

4 11. CPT will continue to maintain and update the Settlement Website with
5 relevant documents, including the Final Approval Order and Judgment once they are
6 entered by the Court, in addition to any updates requested by the parties or required
7 by the Court.

8 **DIRECT NOTICE**

9 12. CPT then prepared a master list of 14,660 Known Settlement Class
10 Members, out of the approximate 28,000 possible Settlement Class Members, to
11 whom CPT would disseminate the Class Notice. As described below, the
12 Supplemental Media Plan was intended to reach Settlement Class Members for whom
13 there was no contact information.

14 13. **Email Notice:** On March 7, 2024, CPT disseminated the Summary
15 Notice by email to 9,139 Known Settlement Class Members with a valid email
16 address. Prior to disseminating the Summary Notice by email, CPT utilized an email
17 look-up service to obtain emails addresses for the class. This process resulted in 9,139
18 email addresses for Known Settlement Class Members. In addition, CPT ran the list
19 of known email addresses through a cleansing scan to identify any known abuse or
20 otherwise invalid email addresses. Attached hereto as **Exhibit D** is a true and correct
21 copy of the Summary Notice sent by email.

22 14. **Mail Notice:** On the same day, CPT issued the Summary Notice
23 (postcard) to 5,521 Known Settlement Class Members who had a valid mailing
24 address but no valid email. Prior to mailing, CPT checked all mailing addresses
25 against the National Change of Address (NCOA) database to ensure mailing to the
26 best address available. Attached hereto as **Exhibit E** is a true and correct copy of the
27 Summary Notice postcard.
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1 influencers interacting with the content, which resulted in 3,426 views of our release
2 and 1,356 click-throughs to our website. The press release included the toll-free
3 number and settlement website address so potential Settlement Class Members could
4 easily access information about the Settlement. Attached hereto as **Exhibit G** is a true
5 and correct copy of the Press Release.

6 7 **SUMMARY OF NOTICE PLAN**

8 19. The Notice Plan sought to reach approximately 71% of the target
9 audience (i.e., the potential Settlement Class) through paid keyword search on Google
10 & Bing, and social media advertisement campaign on Facebook and Instagram,
11 supplemented by a press release, settlement website, email and call center support.

12 20. In summary, the Notice Plan was successfully and timely implemented
13 on March 14, 2024, and completed on April 27, 2024, in compliance with the parties'
14 Settlement Agreement and the Court's Preliminary Approval Order.

15 **CLAIMS ADMINISTRATION**

16 21. The deadline for Settlement Class Members to submit a Claim Form is
17 September 3, 2024, for Tier 1(a) and February 12, 2025 for Tier 1(b) and Tier 2. Upon
18 receipt, CPT reviews each Claim Form to determine whether it is valid, invalid, or
19 deficient and requires follow up. In addition, CPT reviews each claim to ensure
20 acceptable documentation and proof are provided, as required by the Settlement
21 Agreement.

22 22. As of the date of this declaration, there are 1,751 valid claims, which
23 encompass 139 Tier 1(a) claims, 1,578 Tier 1(b) claims and 27 Tier 2 claims.

24 23. As of the date of this declaration, CPT has received a combined total of
25 2,603 Claim Forms, with 2,225 submissions from Unknown Class Members and 378
26 from Known Class Members.

27 24. **Deficient Claims:** Of the 2,603 claims received, there are currently 176
28 outstanding claims that are deficient in one or more of the following ways:

- a. Invalid supporting documentation, including blank document attachments and/or items not relevant to the settlement.
- b. Proof of purchase outside the covered period; and/or
- c. Incomplete claim forms

25. CPT has addressed the deficient claims by sending each claimant a letter (by email if available, or mail if only address is available) providing clear instruction as to how to cure their Claim Form deficiency. Claimants are given a period of 30 days from the date the deficiency notice was issued to submit their cure.

26. **Invalid Claims:** Of the 2,603 claims received, 40 have been determined to be invalid due to various reasons including being a duplicate or claim documentation falling outside the class period. For the reasons listed above in paragraph 24, particularly the prevalence of attempts to use suspicious proof of purchase readily found online to substantiate claims, we anticipate that the remaining pending deficient claims will ultimately be invalid.

27. **Valid Claims:** As stated above in paragraph 22, there are a total of 1,751 valid claims. Of those, 222 valid claims are from Known Class members and 1,529 valid claims are from Unknown Class members. These claims relate to a total of 139 are Tier 1(a) reimbursement claims (up to \$400 per class product), 1,578 are Tier 1(b) extended service plan for past display failures claims and 27 are Tier 2 extended service plan future display claims. If the total amount of claims exceeds the funds available to the Class, the amount paid on each claim will be reduced pro-rata.

28. CPT plans to send reminder notices to Known Settlement Class Members the conclusion of the claims period approaches. These reminders will be sent to the Known Settlement Class Members who have not submitted a claim to date in an effort to increase the overall number of claims.

29. While the final valid claims count will be pending until after the conclusion of the claims period, based on the response rate thus far at 9.2%, the final

1 valid claims rate will likely be higher than typical claims rates we see in our
2 experience in similar matters.

3 **REQUESTS FOR EXCLUSION AND OBJECTIONS**

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5 30. The deadline for Settlement Class Members to request exclusion (opt-
6 out) from the class, or object to the settlement was April 25, 2024. As the date of this
7 declaration, CPT has not received any Opt-Outs or Objections to the Settlement.

8 **ADMINISTRATION FEES**

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10 31. If the Court grants final approval of the Settlement, CPT will handle
11 further steps of settlement administration in accordance with the Settlement
12 Agreement and the Court's order.

13 32. CPT initially estimated the costs for notice and claims administration of
14 this Settlement to be \$90,000 based on 28,000 class members and a 5% response rate.
15 We will re-evaluate our final fees once the claims period is over and all services
16 completed and pending are accounted for.

17 **CONCLUSION**

18 33. Based on CPT's experience, the outreach efforts of the notice plan
19 described above in paragraphs 13-20 reflect an appropriate, highly targeted and
20 contemporary way to provide notice to the class. This multi-media channel approach
21 utilized direct notice, as well as digital notice via social and mobile media to reach
22 the anticipated percentage of potential Settlement Class Members. The efforts used in
23 this notice plan were of the highest modern communication standards, were
24 reasonably calculated to provide sufficient notice to the class and were consistent with
25 best practicable court-approved notice programs in similar matters and satisfy the due
26 process requirements.

1 I declare under penalty of perjury under the laws of the United States and the
2 State of Washington that the foregoing is true and correct.

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4 Executed on May 9, 2024, at Irvine, California.

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7 JULIE N. GREEN
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EXHIBIT A

If you purchased a Bosch-manufactured microwave/oven, you may be entitled to benefits from a class action settlement.

A federal court authorized this Notice. This is not a solicitation from a lawyer.

- A Settlement has been reached in a class action lawsuit against BSH Home Appliances Corporation (“Bosch” or “Defendant”) regarding microwave/oven combination appliances equipped with a vacuum fluorescent display (“VFD”) control panel (the “Class Products”).
- If you are included in the Settlement, you may qualify for a cash reimbursement for out-of-pocket costs up to \$400.00 with proof that such out-of-pocket costs related to the Past Display Failure and/or an extended service plan of three (3) years from the date of purchase wherein Bosch would replace any VFD control panel that experienced a Display Failure.
- Your legal rights are affected whether you act or don’t act. Read this Notice carefully.

YOUR RIGHTS AND OPTIONS IN THIS SETTLEMENT		DEADLINE
SUBMIT A CLAIM FORM	Submitting a Claim Form is the only way to seek benefits relating to Class Products with VFD control panel Display Failure. For repairs or replacements occurring prior to the date you received the settlement Notice, your deadline to submit a claim form is September 3, 2024 . For repairs or replacements occurring after the date you received the Settlement Notice, your deadline to submit a claim is within ninety (90) days following the repair.	Tier 1(a): September 3, 2024 Tier 1(b) and Tier 2*: February 12, 2025 *210 days from the effective date of the settlement, or the remainder of the extended service plan, whichever is longer.
	Tier 1: If you had a Display Failure on or before March 7, 2024, you may qualify for benefits including: <ol style="list-style-type: none"> 1. Tier 1(a): Reimbursement up to \$400.00 for out-of-pockets costs. 2. Tier 1(b): Extended service plan benefit of three (3) years. Tier 2: If you had a Display Failure after March 7, 2024, you may qualify for an extended service plan benefit of three (3) years.	
EXCLUDE YOURSELF FROM THE CLASS	Excluding yourself, or “opting out,” is the only option that allows you to ever be part of another lawsuit against Bosch for the legal claims resolved by this Settlement. If you exclude yourself from this Settlement, you will not be entitled to any of the benefits provided by this Settlement.	April 25, 2024
OBJECT	Mailing an objection is the only way to tell the Court that you are unhappy with any aspect of the Settlement.	April 25, 2024
GO TO A HEARING	You may request an opportunity to speak in Court about the fairness of the Settlement.	June 13, 2024
DO NOTHING	If you do not object to the Settlement, exclude yourself from the Settlement or make a claim for a past or future Display Failure as part of this Settlement, you will <u>not</u> receive any benefits of this Settlement, and you will give up your right to ever be part of another lawsuit against Defendant about the legal claims resolved by this Settlement.	

- These rights and options are explained in this Notice.

- The Court in charge of this case still has to decide whether to approve the Settlement. If the Court approves the Settlement and you submit a valid claim, benefits will be issued after any appeals are resolved. Please be patient.

BASIC INFORMATION

1. Why was this Notice issued?

A federal court authorized this Notice because you have a right to know about the proposed Settlement and about all your options before it decides whether to approve the Settlement. This Notice explains the Lawsuits, the Settlement, your legal rights, the available benefits, and who may qualify for those benefits.

Judge Richard A. Jones of the United States District Court, Western District of Washington is overseeing the Settlement, which resolves two similar cases, known as *Hirsch et al. v. BSH Home Appliances Corporation*, No. 8:21-cv-01355-CJC-DFM (C.D. Cal) ("*Hirsch Action*"); and *Peterson et al. v. BSH Home Appliances Corporation*, 2:23-cv-00543-RAJ ("*Peterson Action*"). The people who sued are called the "Plaintiffs," and the company sued BSH Home Appliances, or Bosch, is called the "Defendant."

2. Why did I receive this Notice?

If you received a notice by mail or email, the Defendant's records indicate that you may have purchased a Bosch manufactured microwave/oven combination product with Model Numbers HBL5751UC, HBL8751UC, HBLP751UC, HMC80151UC, HMC80251UC, and HMC87151UC. These specific microwave/ovens are referred to as the "Class Products" throughout this Notice.

3. What is the Lawsuit About?

The Lawsuits claim that the Class Products are equipped with defective VFD control panels, in that the design of the control panels causes the panels to fade, dim, become unreadable, and/or fail altogether.

Defendant denies that it has committed or engaged in any misconduct, wrongdoing, or other actionable conduct, denies that the Class Products are defective, denies that the control panels fade or dim, denies all liability, and asserts numerous defenses to Plaintiffs' allegations.

The Settlement does not include personal injury or property damage claims other than for damage to the Class Product itself, and the Settlement does not release any of these claims.

4. Why is this a class action?

In a class action, one or more people called "Class Representatives" sue for all people who have similar claims. Together, these people with similar claims are called a "Settlement Class" or "Class Members." One court resolves the legal issues for all Class Members, except for those who exclude themselves from the Settlement Class.

5. Why is there a Settlement?

The Court did not decide which side was right or whether the Class Products are defective. Instead, both sides agreed to the Settlement to avoid the costs and risks of further litigation and to provide benefits to Class Members. The Settlement does not mean that the Court found that Defendant broke any laws or did anything wrong. The Class Representatives and the lawyers representing them (called "Class Counsel") believe that the Settlement is in the best interests of all Class Members.

THE SETTLEMENT CLASS—WHO IS INCLUDED

6. Who is included in the Settlement?

The "Settlement Class" includes all persons in the United States and its territories who either (a) purchased a new Class Product, or (b) acquired a new Class Product as part of the purchase or remodel of a home, or (c) received as a gift, from a donor meeting those requirements, a new Class Product not used by the donor or by anyone else after the donor purchased the Class Product and before the donor gave the Class Product to the Settlement Class Member, during the Class Period.

7. How do I know if I am a Class Member?

To determine if you are a Class Member, you need to verify that the model number and serial number of your microwave/over combination is listed among qualifying Class Products in the Settlement. These specific microwave/ovens have Model Numbers HBL5751UC, HBL8751UC, HBLP751UC, HMC80151UC, HMC80251UC, and HMC87151UC. You can also visit the Settlement Administrator's website www.BSH-VFDSettlement.com for more information.

8. Who is not included in the Settlement?

The following are not included in the Settlement Class: (i) officers, directors, and employees of Bosch or its parents,

subsidiaries, or affiliates; (ii) insurers of Settlement Class Members; (iii) subrogees of all entities claiming to be subrogated to the rights of a Class Product purchaser, a Class Product owner, or a Settlement Class Member; (iv) persons who acquired an other-than-new Class Product; (v) issuers or providers of extended warranties or service contracts for Class Products; and (vi) persons who timely and validly exercise their right to be removed from the Settlement class, as described below.

THE SETTLEMENT BENEFITS—WHAT YOU GET IF YOU QUALIFY

9. What does the Settlement provide?

Bosch will pay a maximum of up to \$2,000,000 (“Settlement Fund”) for reimbursement of sufficiently documented out-of-pocket costs up to \$400.00 per claim with proof that such out-of-pocket costs related to the Past Display Failure; and/or an extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any VFD control panel that experienced a Display Failure. In addition, Service Awards to the Class Representatives, Notice and Administration to the Settlement Administrator, and Attorney’s Fees to Class Counsel will be paid from Settlement Fund. If the total amount of refund claims exceeds the funds available to the Class, the amount paid on each claim will be reduced *pro-rata*.

10. Tell me more about reimbursements and benefits available for Past and Future Display Failure?

Any Settlement Class Member who provides sufficient documentary Proof of Ownership and Proof of Display Failure is entitled to the following benefits:

- **Tier 1:** (a) Reimbursement of sufficiently documented out-of-pocket costs up to \$400.00 with proof that such out-of-pocket costs related to the Past Display Failure; and (b) An extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any VFD control panel that experienced a Display Failure.
- **Tier 2:** Settlement Class Members with a Future Display Failure are entitled to an extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any VFD control panel that experienced a Display Failure.

Class Members seeking benefits under the terms of this Settlement Agreement must meet the following requirements subject to Tier 1 and Tier 2 benefits:

- Proof of Ownership: (a) a valid Class Product model number and serial number combination, together with (b) documentary proof showing that the Settlement Class Member either purchased a new Class Product, or acquired a Class Product as part of the purchase or remodel of a home, or received as a gift, from a donor meeting those requirements, a new Class Product not used by the donor or by anyone else after the donor purchased the Class Product and before the donor gave the Class Product to the Settlement Class Member. Sufficient documentary proof includes, but is not limited to, purchase receipts, checks, credit card statements, and warranty registrations sufficient to identify the approximate date of purchase, purchaser (or builder/contractor if acquired as part of the purchase or remodel of a home), and model of the Class Product. If no such documentary proof of ownership is available, then the claimant shall provide a claim-form declaration, signed under oath, stating that the claimant cannot locate sufficient documentary proof, and that the claimant meets the Settlement Class definition.
- Proof of Display Failure: In addition to the requirements listed above, to be eligible for Tier 1(a) under this Settlement, a Class Member must submit sufficient documentary proof of Display Failure. Similarly, Tier 1(b) and Tier 2 Settlement Class Members must submit sufficient documentary proof of Display Failure to receive benefits under the extended service plan. Sufficient documentary proof that the claimant actually experienced a Display Failure includes, but is not limited to, photographs, communications with Bosch describing the Display Failure, service tickets, service estimates, service invoices, technician affidavits, and service receipts. If no such documentary proof is available, then the claimant shall provide a claim-form declaration, signed under oath, that the claimant experienced a Display Failure. If the Settlement Class Member does not provide documentary proof or a declaration, the Settlement Class Member will not be entitled to any Settlement Benefit. Settlement Class Members who experience a Future Display Failure must provide sufficient documentary proof of the Display Failure consistent with the Settlement claims process; a claim-form declaration will not be sufficient for proof of a Future Display Failure.
- Proof of Paid Qualifying Repair or Replacement: In addition to the requirements described above, Tier 1(a) Class Members seeking reimbursement for Paid Qualifying Repair or Replacement must also submit sufficient documentary proof that the Settlement Class Member paid an out-of-pocket amount associated with the Display Failure. Sufficient documentary proof may include anything demonstrating the amount of out-of-pocket expenses related to the Display Failure including receipts, checks, credit card statements, or service receipts. A claim-form declaration will not be sufficient proof of the actual amount for reimbursement. If the Settlement Class Member does not provide sufficient documentary proof that the Settlement Class Member paid an out-of-pocket amount associated with the Display Failure, the Settlement Class Member will not be entitled to any Tier 1(a) Settlement

Benefits. Settlement Class Members who meet and satisfy the threshold requirements of Tier 1(a) benefits above will be entitled to reimbursement of certain out-of-pocket expenses constituting a Paid Qualifying Repair or Replacement up to \$400.00.

- **Extended Service Plan for Display Failures [Tier 1(b) and Tier 2]:** Settlement Class Members who are currently experiencing a documented Display Failure or experience a Future Display Failure after the Notice Date, but within three years after the manufacture of their Class Products, will have the VFD control panel replaced by Bosch. Bosch may provide this service through its existing warranty process and/or provide the cash value of the replacement parts and labor, not to exceed \$250.00. To be eligible for compensation for a Future Display Failure, a Settlement Class Member must submit a claim to CPT and/or a repair request to Bosch within ninety (90) days of the Display Failure meeting the requirements described above for proof of ownership and display failure.
- **Expired Extended Service Plan:** For purchases where the extended service plan benefit has expired prior to or on the Effective Date, the Class Member shall be entitled to one hundred twenty (120) days from the Effective Date to submit an Extended Service Claim.

11. What is the deadline to submit a Claim Form for Past Display Failure?

All claims for Tier 1(a) Settlement Benefits as described in question 10 above must be submitted by **September 3, 2024**.

12. What is the deadline to submit a Claim Form for a Future Display Failure?

“Extended Service Claims Period” means, for Tier 1(b) and Tier 2 Class Members, two hundred and ten (210) days from the Effective Date of the Settlement, or the remainder of the extended service plan, whichever is longer.

HOW TO GET BENEFITS—SUBMITTING A CLAIM FORM

13. How many benefits can I receive?

If you qualify, you may receive one benefit for each Class Product you purchased or acquired. You must submit a separate Claim Form for each Class Product. You must select the benefit you wish to receive at the time you submit your Claim Form.

14. How do I get a Settlement benefit to which I am entitled?

You must complete and submit a Claim Form, including required documentation, either on-line or via U.S. Mail by **September 3, 2024** for a Past Display Failure or **within 90 days** of experiencing a Future Display Failure. Claim Forms are available for download and online submission at www.BSH-VFDSettlement.com. You can also contact the Settlement Administrator by telephone at **1-888-919-4128**, by email at BSH-VFDSettlement@cptgroup.com, or by writing to Bosch Microwave/Oven Settlement Administrator, c/o CPT Group, Inc., 50 Corporate Park Irvine, CA 92606, to request a Claim Form. **If you fail to provide the information requested on the Claim Form or if you do not upload or mail your documentary proof, then you will not be entitled to any compensation or benefit under this Settlement.**

15. What rights am I giving up by getting benefits and staying in the Settlement Class?

Unless you exclude yourself, you are staying in the Settlement Class. If the Settlement is approved and becomes final, all the Court’s orders will apply to you and legally bind you. Generally, that means you won’t be able to sue, continue to sue, or be part of any other lawsuit against Defendant or other released parties (“Releasees”) for the legal issues and claims resolved by this Settlement. **Personal injury claims or claims for damage to property other than to the Class Dishwasher itself are not affected or released by this Settlement.** The specific rights you are giving up are called Released Claims (see Question 16).

16. What are the Released Claims?

Plaintiffs and all Settlement Class Members who do not timely exclude themselves from the Settlement do forever release, acquit, and discharge Releasees from all manner of actions, causes of action, administrative claims, demands, debts, damages, costs, attorney fees, obligations, judgments, expenses, or liabilities for economic loss, in law or in equity, whether now known or unknown, contingent or absolute, including all claims that Plaintiffs or Settlement Class Members now have or, absent this Agreement, may in the future have had, against Releasees, by reason of any act, omission, harm, matter, cause, or event whatsoever that has occurred from the beginning of time up to and including the Effective Date of this Agreement, and that arise from or relate to any of the defects, malfunctions, or inadequacies of the Class Products that are alleged or could have been alleged in the Lawsuits arising out of or relating to Display Failures, or to

any act, omission, damage, matter, cause, or event whatsoever arising out of the initiation, defense, or settlement of the Lawsuits or the claims or defenses asserted in the Lawsuits, including without limitation all claims for out-of-pocket expense, diminution-in-value, benefit-of-the-bargain, cost-of-repair, cost-of-replacement, statutory, or premium-price damages or restitution of the Class Products relating to Display Failures (the “Released Claims”).

The complete Settlement Agreement describes the Released Claims in full. Please read it carefully. A copy of the Settlement Agreement is available at www.BSH-VFDSsettlement.com. You can also talk to one of the lawyers listed below for free or you can, of course, talk to your own lawyer at your own expense if you have questions about the Released Claims or what they mean.

THE LAWYERS REPRESENTING YOU AND THE SETTLEMENT CLASS

17. Do I have a lawyer in this case?

Yes. The Court appointed Harper Segui, Rachel Soffin, Erin Ruben, and Thomas Pacheco of Milberg Coleman Bryson Phillips Grossman, LLC as Class Counsel, to represent you and other Class Members. You will not be charged for the services of Class Counsel. If you want to be represented by your own lawyer, you may hire one at your own expense.

18. How will the lawyers be paid?

Class Counsel will ask the Court to award them up to \$725,000.00 for attorney fees and reimbursement of the litigation expenses and costs they incurred and/or advanced. They will also ask for service awards of \$2,500.00 to be paid to each of the Class Representatives Elizabeth Peterson, Rebecca Hirsch, Prasanna Ramakrishnan, Amanda Carlton, and Michele O'Dell out of the Settlement Fund. In addition, Defendant has also agreed to pay the Settlement Administrator's fees and expenses, including the costs of mailing the Settlement Notices and distributing any payments owed to Class Members as part of the Settlement Fund.

EXCLUDING YOURSELF FROM THE SETTLEMENT CLASS

If you want to keep the right to sue or continue to sue Defendant about the legal claims in this lawsuit, and you don't want to receive benefits from this Settlement, you must take steps to exclude yourself from the Settlement. This is sometimes called “opting out” of the Settlement Class.

19. How do I get out of the Settlement?

To exclude yourself from the Settlement, you must request from the Settlement Administrator a Request for Exclusion. You must provide your name, email address, mailing address, model number, and serial number of your Class Product. To be valid, your Request for Exclusion must include all the information requested, must be individually signed, and must be individually sent to the Settlement Administrator at the address below with a postmark no later than **April 25, 2024**.

Bosch Microwave/Oven Settlement
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

20. If I exclude myself, can I still get benefits from this Settlement?

No. If you exclude yourself, you are telling the Court that you don't want to be part of the Settlement Class in this Settlement. You can only get Settlement benefits if you stay in the Settlement Class and submit a valid Claim Form for benefits as described above.

21. If I don't exclude myself, can I sue Defendants for the same claims later?

No. Unless you exclude yourself, you are giving up the right to sue Defendant for the claims that this Settlement resolves and releases (see Question 16). You must exclude yourself from this Settlement Class to start or continue with your own lawsuit or be part of any other lawsuit involving the same claims.

OBJECTING TO THE SETTLEMENT

You can tell the Court if you don't agree with the Settlement or with any part of it.

22. How do I tell the Court if I don't like the Settlement?

If you do not exclude yourself from the Settlement, you may object to it. You can give reasons why you think the Court should not approve the Settlement. The Court will consider your views before making a decision. To object, you or your attorney must mail and cause to be postmarked a written objection and supporting papers to the Settlement

Administrator, Class Counsel, and Counsel for Bosch. Your objection must contain: (1) the name of the Lawsuit (*Peterson et al. v. BSH Home Appliances Corporation, Case No.2:23-cv-543-RAJ*); (2) your full name and current address; (3) the serial number and model number of your Class Product; (4) the specific reasons for your objection; (5) any evidence and supporting papers (including, but not limited to, all briefs, written evidence, and declarations) that you want the Court to consider in support of your objection; (6) your signature; and (7) the date of your signature.

You must mail your written objection to:

SETTLEMENT ADMINISTRATOR	CLASS COUNSEL	DEFENSE COUNSEL
Bosch Microwave Settlement c/o CPT Group, Inc. 50 Corporate Park Irvine, CA 92606	Harper T. Segui Rachel Soffin, Milberg, Coleman, Bryson, Phillips, Grossman, LLC 825 Lowcountry Blvd, Ste 101 Mt. Pleasant, SC 29464	Jasmine W. Wetherell Perkins Coie LLP 1888 Century Park East Suite 1700 Los Angeles, CA 90067-1721

Your written objection must be mailed with a postmark no later than **April 25, 2024**.

23. What is the difference between objecting and asking to be excluded from the Settlement?

Objecting is simply telling the Court that you don't like something about the Settlement. You can object only if you stay in the Settlement Class (do not exclude yourself). Excluding yourself is telling the Court that you don't want to be part of the Settlement Class. If you exclude yourself, you cannot object because the Settlement no longer affects you.

THE COURT'S FAIRNESS HEARING

The Court will hold a hearing to decide whether to approve the Settlement. You may attend and you may ask to speak at the hearing, but you are not required to.

24. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Fairness Hearing on **June 13, 2024**, at the U.S. District Court for the Western District of Washington, located at the 700 Stewart Street, Suite 13128, Seattle, WA 98101, to consider whether the Settlement is fair, adequate, and reasonable, and whether it should be finally approved. If there are objections, the Court will consider them. The Court will listen to people who have asked to speak at the hearing (see Question 26). The Court may also decide the amount of fees, costs, and expenses to award Class Counsel and the payment amount to the Class Representatives. This hearing may be continued or rescheduled by the Court without further notice to the Settlement Class.

25. Do I have to come to the hearing?

No. Class Counsel is working on your behalf and will answer any questions the Court may have about the Settlement. However, you are welcome to come at your own expense. If you mail an objection to the Settlement, you don't have to come to Court to talk about it. As long as you mail your written objection on time, sign it, and provide all of the required information (see Question 22) the Court will consider it. You may also pay your own lawyer to attend, but it's not necessary.

26. May I speak at the hearing?

Yes. You may ask the Court to speak at the Fairness Hearing. To do so, you must mail a written request to the Court stating that it is your "Notice of Intent to Appear at the Fairness Hearing in *Peterson v. BSH Home Appliances Corp. Case No.2:23-cv-543-RAJ*" and serve copies of that notice on Class Counsel and Defendant using the addresses listed in Question 22. You must include your name, address, telephone number, and signature. If you plan to have your own attorney speak for you at the hearing, you must also include the name, address and telephone number of the attorney who will appear on your behalf. Your written Notice of Intent to Appear must be mailed to the Court by **April 4, 2024**.

IF YOU DO NOTHING

27. What happens if I do nothing?

If you do nothing, you won't get any benefits from this Settlement. If the Court approves the Settlement, you will be bound by its terms, and you will give up your right to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant and the other Releasees about the legal issues or claims resolved and released by this Settlement.

GETTING MORE INFORMATION

28. Where can I get more information?

This Notice summarizes the Settlement. More details are in the Settlement Agreement, available online at www.BSH-VFDSettlement.com. If you have questions, you may contact the Settlement Administrator at the address listed in response to Question 14, BSH-VFDSettlement@cptgroup.com or **1-888-919-4128** or visit Class Counsel's website (www.milberg.com) for their contact information should you wish to communicate with them directly.

DO NOT WRITE OR CALL THE COURT, BOSCH, OR ANY APPLIANCE RETAILER, DEALER, OR AGENT FOR INFORMATION ABOUT THE SETTLEMENT OR THIS LAWSUIT.

EXHIBIT B

Peterson et al. v. BSH Home Appliances Corporation
United States District Court for the Western District of Washington
Case No. 2:23-cv-00543-RAJ

Tier 1 Benefits Claim Form

Please read the full Notice of this Settlement (available at www.BSH-VFDSettlement.com) carefully before filling out this Claim Form.

If you are a Settlement Class Member and wish to receive reimbursement for out-of-pocket costs related to a Past Display Failure and/or seek an extended service plan benefit, your completed Claim Form must be postmarked on or before September 3, 2024 or submitted online on or before September 3, 2024.

Any Settlement Class Member who provides sufficient documentary Proof of Ownership and Proof of Display Failure is entitled to the following benefits under **Tier 1**:

Tier 1 (a) Reimbursement of sufficiently documented out-of-pocket costs up to \$400.00 with proof that such out-of-pocket costs related to the Past Display Failure; and,

Tier 1 (b) An extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any vacuum fluorescent display ("VFD") control panel that experienced a Display Failure.

IN THE SECTIONS BELOW, THIS CLAIM FORM ASKS YOU TO (1) PROVIDE YOUR CONTACT INFORMATION, (2) CONFIRM PROOF OF OWNERSHIP, (3) PROVIDE DOCUMENTATION OF A DISPLAY FAILURE, (4) PROVIDE DOCUMENTATION OF OUT-OF-POCKET EXPENSES, AND/OR (5) ELECT THE EXTENDED WARRANTY.

To be eligible to receive any benefits from the settlement obtained in this class action lawsuit, you must submit this completed Claim Form online or by mail:

ONLINE: Visit www.BSH-VFDSettlement.com and submit your claim online.

MAIL: Bosch Microwave/Oven Settlement
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

PART ONE: CLAIMANT INFORMATION

Provide your name and contact information below. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form.

First Name: _____ Last Name: _____

Current Street Address: _____

Current City: _____ State: _____ Zip Code: _____

Email Address: _____ Phone Number: _____

PART TWO: TIER 1 CLAIM INFORMATION

To qualify for a reimbursement (cash payment) of up to \$400.00 and/or an extended service plan benefit of three (3) years from the date of purchase, you must provide sufficient documentary Proof of Ownership and Proof of Display Failure.

Model Number of Class Product Microwave/Oven

Serial Number of Class Product Microwave/Oven

Please answer the following questions:

PROOF OF OWNERSHIP

1. Are you a resident of the United States or its territories who purchased, received as a gift, or acquired as part of the purchase or remodeling of a home, a new Class Product (i.e., a Bosch-manufactured microwave/oven combination with a model and serial number listed as eligible for settlement benefits in the Class Notice?

Yes ☐ No ☐

(If you answered “No” to this Question, **STOP**; you are not entitled to any compensation or benefit under this Settlement.)

2. Do you have documentation showing that you purchased a new Class Product, or acquired a new Class Product as part of a purchase or remodel of a home, or received a new Class Product as a gift?

Yes ☐ No ☐

If you answered “Yes” you MUST gather and mail your documents or you will not be entitled to any compensation or benefit under this Settlement. *Sufficient documentary proof includes, but is not limited to, purchase receipts, checks, credit card statements, and warranty registrations sufficient to identify the approximate date of purchase, purchaser (or builder/contractor if acquired as part of the purchase or remodel of a home), and model of the Class Product.*

Documents included with this claim form as proof of ownership include: _____

If you answered “No” please complete the **DECLARATION** at the end of this form after you answer the remaining questions below.

PROOF OF PAST DISPLAY FAILURE

3. Do you have documentation showing that your Class Product experienced a Display Failure?

Yes ☐ No ☐

If you answered “Yes” you MUST gather and mail your documents, or you will not be entitled to any compensation or benefit under this Settlement. *Examples of sufficient documentation include, but are not limited to, photographs, communications with Bosch describing the Display Failure, service tickets, service estimates, service invoices, technician affidavits, and service receipts that show you experienced this problem.*

Documents included with this claim form as proof of display failure include: _____

If you answered “No” to this Question, please see the **DECLARATION** at the end of this form after you answer the remaining questions below.

PROOF OF OUT-OF-POCKET EXPENSES

4. Do you have documentation showing you paid out-of-pocket to repair or replace your Class Product in response to any VFD control panel that experienced a Display Failure?

Yes ☐

No ☐

If you answered “Yes,” you MUST gather and mail your documents, or you will not be entitled to any compensation or benefit under this section. Sufficient documentary proof may include anything demonstrating the amount of out-of-pocket expenses related to the Display Failure, including receipts, checks, credit card statements, or service receipts.

Documents included with this claim form as proof of out-of-pocket expenses include: _____

If you answered “No” to this Question, you are not entitled to any reimbursement under Tier 1(a) of this Settlement, however you may be eligible for Tier 1(b) benefits, therefore please proceed to Part Three.

POTENTIAL CASH PAYMENT*:

Depending on your responses above, you may be entitled to receive a cash payment of up to \$400.00 if you provide sufficient proof.

** The cash payments set out herein represent the maximum you can receive under the settlement. The actual cash paid may be reduced depending on the aggregate total of claims submitted by all Settlement Class Members.*

The cash will be sent in the form of a paper check to the address listed on page 1 of this Claim Form. Please provide updated information to the Settlement Administrator, if needed.

If you would like payment in a different form, for example, Paypal, Venmo, or Direct Deposit, please file your Claim Form electronically through the Settlement Website at www.BSH-VFDSettlement.com.

PART THREE: DECLARATION AND CERTIFICATION STATEMENTS

PROOF OF OWNERSHIP DECLARATION – *If you answered No to Question 1, please sign by checking the box below to confirm proof of ownership.*

- ☐ I declare under penalty of perjury of the laws of the United States that I have searched for but am unable to find documentary proof, but that I qualify for membership in the class because I either purchased a new Class Product, acquired a new Class Product as part of a purchase or remodel of a home, or received a new Class Product as a gift.

If you were unable to sign the Declaration above, **STOP**; you are not entitled to any benefit.

PROOF OF DISPLAY FAILURE DECLARATION– *If you answered No to Question 3, please sign by checking the box below to confirm proof of past display failure.*

- ☐ I declare under penalty of perjury of the laws of the United States that I have searched for but am unable to find documentary proof of Past Display Failure, but that I qualify for membership in the class because my Class Product experienced a Display Failure.

If you were unable to sign the Declaration above, **STOP**; you are not entitled to any benefit.

CERTIFICATION STATEMENT (*Please note that you will not be eligible to receive any settlement benefit unless you sign and date this statement.*): I declare under penalty of perjury of the laws of the United States that all information provided in this Claim Form is true and accurate.

Signature

Date

Print Name

CLAIM FORM CHECKLIST

Before submitting this Claim Form, check that you have done the following:

- ☐ Completed all fields in Part One (Name and Contact Information).
- ☐ Provided the Model Number and Serial Number of your Class Product and answered every Question in Part Two, including providing documentation where required.
- ☐ Signed the Declarations (if necessary) and Certification Statement in Part Three.

Please keep a copy of your completed Claim Form for your records.

EXHIBIT C

Peterson et al. v. BSH Home Appliances Corporation
United States District Court for the Western District of Washington
Case No. 2:23-cv-00543-RAJ
Tier 2 Benefits Claim Form

Please read the full Notice of this Settlement (available at www.BSH-VFDSettlement.com) carefully before filling out this Claim Form.

If you are a Settlement Class Member and experience a Display Failure after March 7, 2024 and wish to seek an extended service plan benefit, your completed Claim Form must be postmarked on or before February 12, 2025 or submitted online on or before February 12, 2025.

Any Settlement Class Member who provides sufficient documentary Proof of Ownership and Proof of Display Failure after **March 7, 2024** (“Notice Date”) is entitled to the benefit under **Tier 2** of an extended service plan of three (3) years from the date of purchase, wherein Bosch would replace any vacuum fluorescent display (“VFD”) control panel that experienced a Display Failure.

Extended Service Plan for Display Failures Tier 2: Settlement Class Members who experience a Display Failure after the Notice Date but within three years after the manufacture of their Class Product (i.e., a Bosch-manufactured microwave/oven combination with a model and serial number listed as eligible for settlement benefits in the Class Notice) will have the VFD control panel replaced by Bosch. Bosch may provide this service through its existing warranty process and/or provide the cash value of the replacement parts and labor, not to exceed \$250.00. To be eligible for compensation for a Future Display Failure, a Settlement Class Member must submit a claim to the Settlement Administrator and/or a repair request to Bosch within ninety (90) days of the Display Failure meeting the requirements for proof of ownership and display failure.

IN THE SECTIONS BELOW, THIS CLAIM FORM ASKS YOU TO (1) PROVIDE YOUR CONTACT INFORMATION, (2) CONFIRM PROOF OF OWNERSHIP, (3) PROVIDE DOCUMENTATION OF A DISPLAY FAILURE, AND (4) ELECT THE EXTENDED WARRANTY.

To be eligible to receive any benefits from the settlement obtained in this class action lawsuit, you must submit this completed Claim Form online or by mail:

ONLINE: Visit www.BSH-VFDSettlement.com and submit your claim online.

MAIL: Bosch Microwave/Oven Settlement
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

PART ONE: CLAIMANT INFORMATION

Provide your name and contact information below. It is your responsibility to notify the Settlement Administrator of any changes to your contact information after the submission of your Claim Form.

First Name: _____ Last Name: _____

Current Street Address: _____

Current City: _____ State: _____ Zip Code: _____

Email Address: _____ Phone Number: _____

PART TWO: TIER 2 CLAIM INFORMATION

To qualify for an extended service plan benefit of three (3) years from the date of purchase, you must provide sufficient documentary Proof of Ownership and Proof of Display Failure.

Model Number of Class Product Microwave/Oven

Serial Number of Class Product Microwave/Oven

Please answer the following questions:

PROOF OF OWNERSHIP

1. Are you a resident of the United States or its territories who purchased, received as a gift, or acquired as part of the purchase or remodeling of a home, a new Class Product (i.e., a Bosch-manufactured microwave/oven combination with a model and serial number listed as eligible for settlement benefits in the Class Notice)?

Yes ☐

No ☐

(If you answered “No” to this question, **STOP**; you are not entitled to any compensation or benefit under this Settlement.)

2. Do you have documentation showing that you purchased a new Class Product, or acquired a new Class Product as part of a purchase or remodel of a home, or received a new Class Product as a gift?

Yes ☐

No ☐

If you answered “Yes” you MUST gather and mail your documents, or you will not be entitled to any compensation or benefit under this Settlement. *Sufficient documentary proof includes, but is not limited to, purchase receipts, checks, credit card statements, and warranty registrations sufficient to identify the approximate date of purchase, purchaser (or builder/contractor if acquired as part of the purchase or remodel of a home), and model of the Class Product.*

Documents included with this claim form as proof of ownership include: _____

If you answered “No” please complete the **DECLARATION** at the end of this form after you answer the remaining questions below.

PROOF OF DISPLAY FAILURE

3. Do you have documentation showing that your Class Product has experienced a Display Failure?

Yes ☐

No ☐

If you answered “Yes” you MUST gather and mail your documents, or you will not be entitled to any compensation or benefit under this Settlement. *Examples of sufficient documentation include, but are not limited to, photographs, communications with Bosch describing the Display Failure, service tickets, service estimates, service invoices, technician affidavits, and service receipts that show you experienced this problem.*

Documents included with this claim form as proof of display failure include: _____

If you answered “No” to this Question, you are not entitled to any benefit under Tier 2 of this Settlement at this time.

PART THREE: DECLARATION AND CERTIFICATION STATEMENTS

PROOF OF OWNERSHIP DECLARATION – *If you answered No to Question 1, please sign by checking the box below to confirm proof of ownership.*

☐ I declare under penalty of perjury of the laws of the United States that I have searched for but am unable to find documentary proof, but that I qualify for membership in the class because I either purchased a new Class Product, acquired a new Class Product as part of a purchase or remodel of a home, or received a new Class Product as a gift.

If you were unable to sign the Declaration above, **STOP**; you are not entitled to any benefit.

CERTIFICATION STATEMENT *(Please note that you will not be eligible to receive any settlement benefit unless you sign and date this statement.):* I declare under penalty of perjury of the laws of the United States that all information provided in this Claim Form is true and accurate.

Signature

Date

Print Name

CLAIM FORM CHECKLIST

Before submitting this Claim Form, check that you have done the following:

- ☐ Completed all fields in Part One (Name and Contact Information).
- ☐ Provided the Model Number and Serial Number of your Class Product and answered every question in Part Two, including providing documentation where required.
- ☐ Signed the Declaration (if necessary) and Certification Statement in Part Three.

Please keep a copy of your completed Claim Form for your records.

EXHIBIT D

Email Notice

To: [Class Member Email Address]
From: BSH-VFDSettlement@cptgroup.com
Subject: Notice of Settlement - Bosch Microwave/Oven Display Failure
Body of Email:

A federal court authorized this notice. This is not a solicitation from a lawyer.

Did you purchase or acquire a Bosch-manufactured microwave/oven equipped with a vacuum fluorescent display (VFD) control panel? If so, you may be entitled to benefits from a class action settlement.

A Settlement has been reached in a class action lawsuit against BSH Home Appliances Corporation (“Bosch” or “Defendant”) regarding microwave/oven combination appliances equipped with a vacuum fluorescent display (“VFD”) control panel (the “Class Products”).

You are receiving this notice because records show that you may be part of this lawsuit.

Who’s Included in the Settlement? The “Settlement Class” includes all persons in the United States and its territories who either (a) purchased a new Class Product, or (b) acquired a new Class Product as part of the purchase or remodel of a home, or (c) received as a gift, from a donor meeting those requirements, a new Class Product not used by the donor or by anyone else after the donor purchased the Class Product and before the donor gave the Class Product to the Settlement Class Member, during the Class Period.

How do I know if I am a Class Member? To determine if you are a Class Member, you need to verify that the model number and serial number of your microwave/oven combination is listed among qualifying Class Products in the Settlement. These specific microwave/ovens have Model Numbers HBL5751UC, HBL8751UC, HBLP751UC, HMC80151UC, HMC80251UC, and HMC87151UC. You can also visit the Settlement Administrator’s website www.BSH-VFDSettlement.com for more information.

What does the Settlement provide? Bosch will pay a maximum of up to \$2,000,000 (“Settlement Fund”) for reimbursement of sufficiently documented out-of-pocket costs up to \$400.00 per claim with proof that such out-of-pocket costs related to the Past Display Failure; and/or an extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any VFD control panel that experienced a Display Failure. In addition, Service Awards to the Class Representatives, Notice and Administration to the Settlement Administrator, and Attorney’s Fees to Class Counsel will be paid from Settlement Fund. If the total amount of refund claims exceeds the funds available to the Class, the amount paid on each claim will be reduced *pro-rata*.

How do I get a Settlement benefit to which I am entitled? You must complete and submit a Claim Form, including required documentation, either on-line or via U.S. Mail by September 3, 2024 for a Past Display Failure or within 90 days of experiencing a Future Display Failure. Claim Forms are available for download and online submission at www.BSH-VFDSettlement.com.

You can make a claim by either 1) mailing a completed Claim Form to the Settlement Administrator; or 2) submitting a Claim Form online at www.BSH-VFDSettlement.com.

Tell me more about reimbursements and benefits available for Past and Future Display Failure? Any Settlement Class Member who provides sufficient documentary Proof of Ownership and Proof of Display Failure is entitled to the following benefits:

Tier 1: If you had a Display Failure on or before March 7, 2024, you may qualify under Tier 1 benefits of this settlement including:

- Tier 1(a) Reimbursement up to \$400.00 for out-of-pockets expenses if documentation is provided.
- Tier 1(b) Extended service plan benefit of three (3) years from the date of purchase.

Tier 2: If you had a Display Failure after March 7, 2024, you may qualify for an Extended service plan benefit of three (3) years from the date of purchase of your product. Documentation is required.

Please use the following CPT ID and PASSCODE to access your claim form on the settlement website.

CPT ID: <<ID>>

Passcode: <<Passcode>>

[Submit Claim](#)

Your Other Options. To exclude yourself from the Settlement, you must request from the Settlement Administrator a Request for Exclusion. You must provide your name, email address, mailing address, model number, and serial number of your Class Product. To be valid, your Request for Exclusion must include all the information requested, must be individually signed, and must be individually sent to the Settlement Administrator at the address below with a postmark no later than **April 25, 2024**.

Members of the class may object to the Settlement by **April 25, 2024**. The Settlement Website (www.BSH-VFDSettlement.com) explains how to exclude yourself or how to object. The Court will hold a Fairness Hearing on **June 13, 2024** to consider whether the Settlement is fair, adequate, and reasonable, and whether it should be finally approved. You may attend and you may ask to speak at the hearing, but you are not required to.

For more information, call 1-888-919-3856 or visit the Settlement Website at www.BSH-VFDSettlement.com.

EXHIBIT E

Who's Included in the Settlement? All persons in the United States and its territories who either (a) purchased a new Class Product, or (b) acquired a new Class Product as part of the purchase or remodel of a home, or (c) received as a gift, from a donor meeting those requirements, a new Class Product not used by the donor or by anyone else after the donor purchased the Class Product and before the donor gave the Class Product to the Settlement Class Member, during the Class Period.

What does the Settlement Provide? Bosch will pay a maximum of up to \$2,000,000 ("Settlement Fund") for reimbursement of sufficiently documented out-of-pocket costs up to \$400.00 per claim with proof that such out-of-pocket costs related to the Past Display Failure; and/or an extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any VFD control panel that experienced a Display Failure. In addition, Service Awards to the Class Representatives, Notice and Administration to the Settlement Administrator, and Attorney's Fees to Class Counsel will be paid from Settlement Fund. If the total amount of refund claims exceeds the funds available to the Class, the amount paid on each claim will be reduced *pro-rata*.

How do I get a Settlement benefit to which I am entitled? You must complete and submit a Claim Form, including required documentation, either on-line or via U.S. Mail by September 3, 2024 for a Past Display Failure or within 90 days of experiencing a Future Display Failure. Claim Forms are available for download and online submission at www.BSH-VFDSettlement.com.

You can make a claim by either 1) mailing a completed Claim Form to the Settlement Administrator; or 2) submitting a Claim Form online at www.BSH-VFDSettlement.com. Please use the CPT ID and PASSCODE located on the front of this postcard to access your claim form on the Settlement Website.

Tell me more about reimbursements and benefits available for Past and Future Display Failure? Any Settlement Class Member who provides sufficient documentary Proof of Ownership and Proof of Display Failure is entitled to the following benefits:

Tier 1: If you had a Display Failure **before or on March 7, 2024**, you may qualify under Tier 1 benefits of this settlement including:

- Tier 1(a) Reimbursement up to \$400.00 for out-of-pockets expenses if documentation is provided.
- Tier 1(b) Extended service plan benefit of three (3) years from the date of purchase.

Tier 2: If you had a Display Failure **after March 7, 2024**, you may qualify for an Extended service plan benefit of three (3) years from the date of purchase of your product. Documentation is required.

Your Other Options: You will be legally bound by the Settlement, whether or not you submit a Claim Form, unless you exclude yourself from the Settlement Class by **April 25, 2024**. If you exclude yourself, you will get no payment from the Settlement.

Members of the class may object to the Settlement by filing a written objection by **April 25, 2024**. The information available on the Settlement Website (www.BSH-VFDSettlement.com) explains how to exclude yourself or object.

The Court will hold a Fairness Hearing on **June 13, 2024** to consider whether the Settlement is fair, adequate, and reasonable, and whether it should be finally approved.

For more information, call 1-888-919-4128, visit the Settlement Website at www.BSH-VFDSettlement.com, or email BSH-VFDSettlement@cptgroup.com.

**A FEDERAL COURT AUTHORIZED THIS NOTICE.
THIS IS NOT A SOLICITATION FROM A LAWYER.**

*You May Be Entitled to Money From A Class Action
Settlement.*

A Settlement has been reached in a class action lawsuit against BSH Home Appliances Corporation ("Bosch" or "Defendant") regarding microwave/oven combination products equipped with a vacuum fluorescent display ("VFD") control panel (the "Class Products"). You may be a member of the Settlement Class entitled to payment. This notice has been approved by the Court.

www.BSH-VFDSettlement.com

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Peterson et al. v. BSH Home Appliances Corporation
c/o CPT Group, Inc.
50 Corporate Park
Irvine, CA 92606

ELECTRONIC SERVICE REQUESTED

CPT ID: «ID»

Passcode: «Passcode»

«FullName»

«Address1» «Address2»

«City», «State» «Zip»

«Barcode»

EXHIBIT F



Creative Workbook

Peterson v. BSH Home Appliances
Corporation

RESPONSE DUE: EOD, TUESDAY 03/5/2024

Ad Copy

Ad Copy



Meta Ad Primary Text & Creative Copy

Did you purchase or acquire a Bosch microwave/oven equipped with a vacuum fluorescent display (VFD) control panel? If so, you may be entitled to benefits from a class action settlement.

Call to Action

File a Claim Today

Button

Learn More

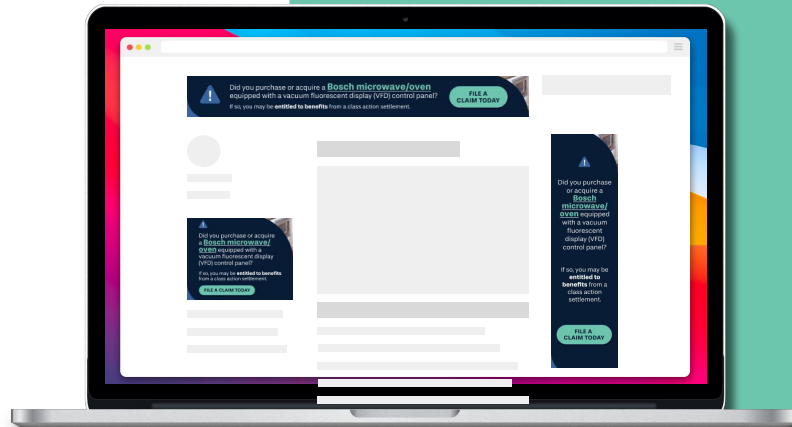
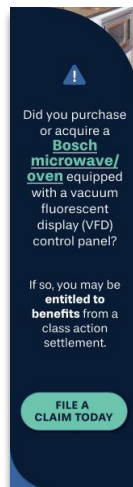
Ad Design

Ad Designs Display Assets

Ad Copy:

Did you purchase or acquire a Bosch microwave/oven equipped with a vacuum fluorescent display (VFD) control panel? If so, you may be entitled to benefits from a class action settlement.

File a Claim Today



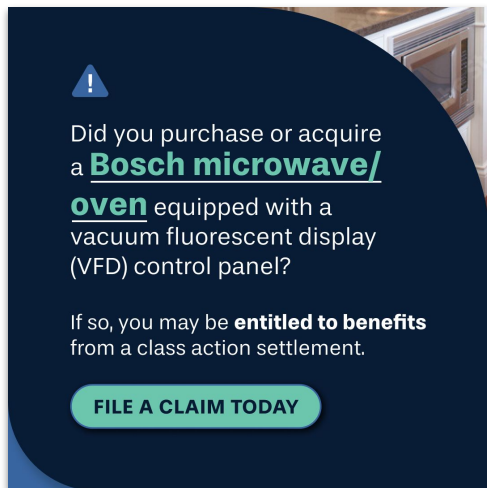
Note: All watermarks and other stock image markings will be removed upon approval.

Disclaimer

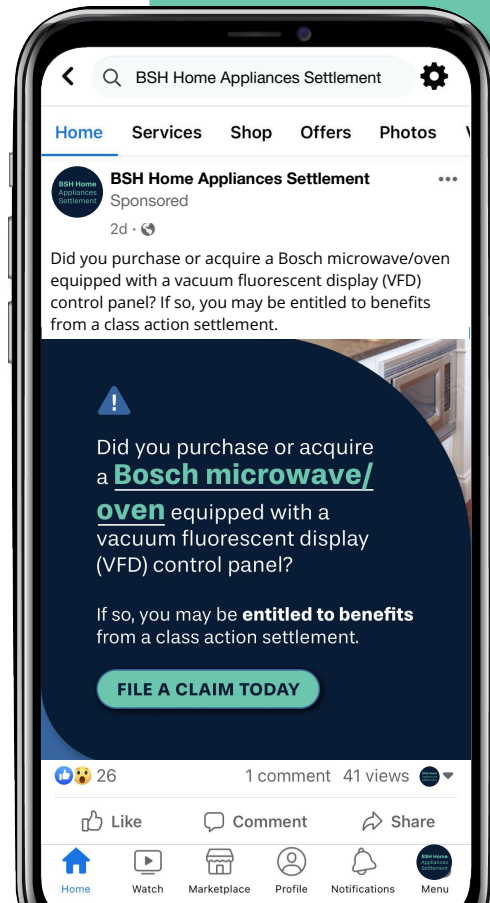
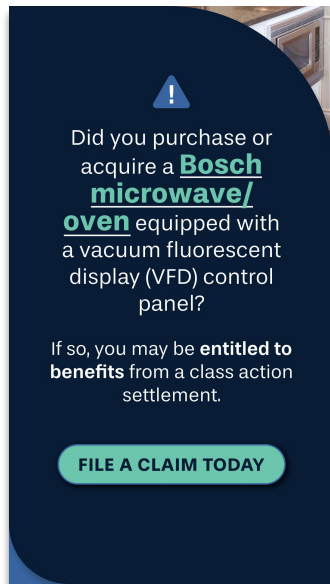
While CPT researches and plans creative and copy around platform restrictions, guidelines are subject to change. Therefore, all imagery, video, and copy are subject to change in order to satisfy the rules and regulations imposed by the applicable platform. This includes, but is not limited to, character limitations, character restrictions, imagery restrictions, etc.

Ad Designs Social Media Assets

Feed Placements



Stories/Reels Placements



Note: All watermarks and other stock image markings will be removed upon approval.

Disclaimer

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Social Pages

Facebook

Page Name

BSH Home Appliances Settlement

Page Handle

@BSHHomeAppliancesSettlement

Page Intro

Visit the website to learn more about this settlement.

Facebook Guidelines

Facebook "Handle" character **limit is 50 characters**

Facebook page "Intro" description **limited to 101 characters**

Instagram

Display Name

BSH Home Appliances Settlement

Handle

@BSHHomeAppliancesSettlement

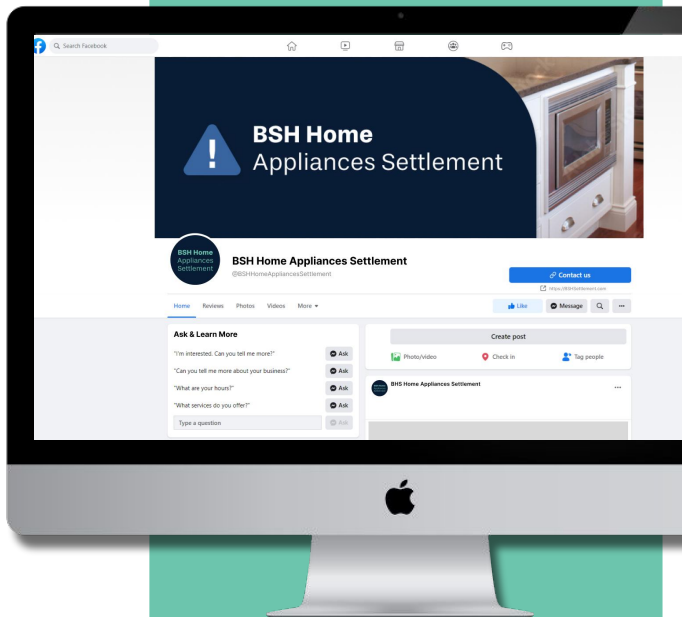
Bio

Visit the website to learn more about this settlement.

Instagram Guidelines

Instagram handle **limited to 30 characters**

Instagram page "Bio" description **limited to 150 characters**



Note: All watermarks and other stock image markings will be removed upon approval.

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Paid Search

Paid Search

Below is a sample of what the Google Paid Search advertising will look like for this class action campaign.

Google's AI can serve the headlines provided in any combination and will optimize toward high-performing headlines. The descriptions provided are "pinned" - meaning Google will only serve **Description A** in position 1. If Google serves a second description, **Description B** will only show in position 2. **Sitelink extensions will change based on page availability on the class action website.**

Text Length Limits


Field	Max length
Headline	30 characters
Description	90 characters

Headlines

Bosch Display Fade Settlement	29 / 30
Display Failure Settlement	26 / 30
Purchased Bosch Microwave?	26 / 30
Bosch Microwave/Oven Lawsuit	28 / 30
Display Fade Settlement	23 / 30

Class Action Lawsuit	20 / 30
Own A Bosch Microwave/Oven?	27 / 30
Bosch Microwave Panel Lawsuit	29 / 30
Microwave Class Action	22 / 30

Descriptions

A	Peterson v. BSH Home Appliances Corporation.	44 / 90	 1
B	If you purchased or acquired a Bosch microwave/oven, you may be eligible.	73 / 90	

Ad www.BSH-VFDSettlement.com 888-919-4128

Own A Bosch Microwave/Oven? | Bosch Display Fade Settlement

Peterson v. BSH Home Appliances Corporation. If you purchased or acquired a Bosch microwave/oven, you may be eligible.

[Submit a Claim](#)

[Important Dates](#)

[Court Documents](#)

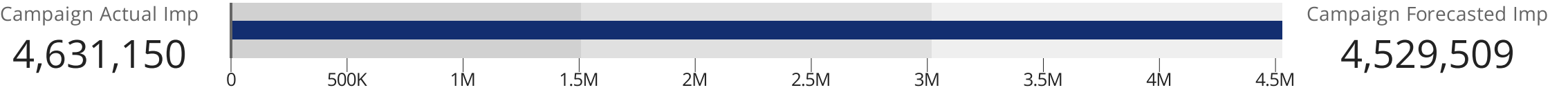
[FAQs](#)



Campaign Date Range: March 14, 2024 to April 27, 2024 | Report Date Range: March 14, 2024 to April 27, 2024

Campaign Overview

Start Date	End Date	Days Past	Days Remaining	% of Flight Remaining
Mar 14, 2024	Apr 27, 2024	45	0	0.00%



Performance Summary

Goal:
To provide notice to class members impacted by the Peterson et al. v. BSH Home Appliances Corporation class action lawsuit by fulfilling the allotted impression goal. Class members are located in the United States and the territories.

Campaign Overview:
Facebook, Instagram, and Display audiences were developed using interest targeting based on home renovation, new homes, and microwaves as well as stores that potential class members may shop at, such as CB2, Pottery Barn, and Williams Sonoma. Audiences also included interest in Bosch microwaves specifically and where they are sold, such as Home Depot, Wayfair, and Best Buy.

3/14 - 3/27: Because of the Meta Awareness campaign's high impression pace and performance, this has allowed for the deployment of a claims-driving campaign, launched on March 18th. This second campaign type allows for the platform to optimize toward users who are most likely to file a claim. In addition to the developed audiences above, the class lookalike data is being used to further target potential class members in this campaign.

Organic and social demographics on Facebook and Instagram show that post engagement was fairly equal between men and women. Additionally, about 19.9% of post-engagement came from 25-34-year-olds. The highest number of ad link clicks on Facebook and Instagram have come from the 25-34 age group with a total of 636.

Paid search had an overall clickthrough rate of 1.60%.

3/28 - 4/10: Organic and social demographics on Facebook and Instagram show that 55% of post engagement has come from men, which was an increase from the first 2 weeks of the campaign. Additionally, about 19.2% of post-engagement came from 35-44-year-olds, which is a change in age group from the weeks prior. The age groups of 55-64 and 25-34 follow closely behind. The highest number of ad link clicks on Facebook and Instagram came from the 55-64 age group with a total of 356, with age groups 25-34 and 35-44 following closely with 353 clicks each. During this time, 97.9% of impressions came from mobile app users.

Throughout the last two weeks, changes to the budget and bids on select keywords have been made in paid search to increase the clickthrough rate. Paid search had an overall clickthrough rate of 2.45%, which is up .85% compared to the two weeks prior.

On April 10th, an increase in claims was seen via referral from openclassactions.com.

4/11 - 4/27: Organic and social demographics on Facebook and Instagram show that 66% of post engagement has come from men, an increase from the previous two weeks of the campaign. Additionally, about 29.8% of post-engagement came from 35-44-year-olds, an increase from the previous weeks. The highest number of ad link clicks on Facebook and Instagram have come from the 35-44 age group with a total of 692. During this time, 96.9% of impressions have come from mobile app users. Throughout the campaign, comments on ads were monitored.

During the final two weeks of the campaign, optimizations within Facebook and Instagram accounted for an increase in claims on the platform.

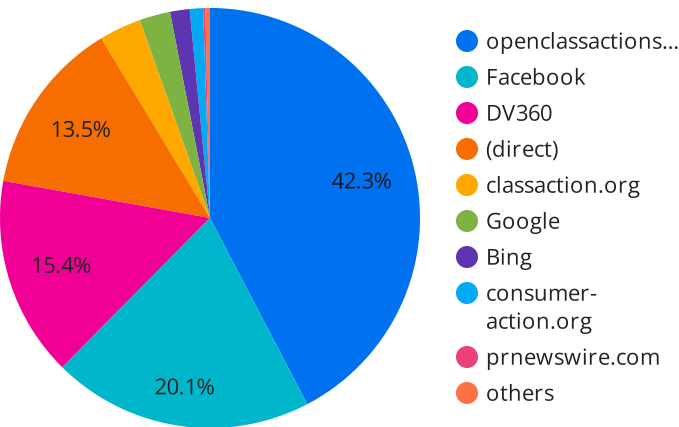
Throughout the last two weeks of the campaign, continued changes to the budget and bids on select keywords were made in paid search to increase the clickthrough rate. Paid search had an overall clickthrough rate of 2.47%.

The April 10th increase in claims due to referral traffic from openclassactions.com continued until April 19th. Over the course of the campaign, openclassactions.com accounted for 1,416 total conversions on the site.

Achieved Impressions By Media Tactic

Paid Social Facebook Ads Instagram Ads	Achieved Impressions 2,991,278
Display Ads Google Display & Video 360 (DV360)	Achieved Impressions 1,609,198
Paid Search Google Ads Search Microsoft Ads (Bing)	Achieved Impressions 30,674

Sessions By First User Source



Claim Submissions

Claims

2,098

This total is based on Google Analytics 4's count of claims filed via the form on the class action's website.

Campaign Date Range: March 14, 2024 to April 27, 2024 | Report Date Range: March 14, 2024 to April 27, 2024

Channel Overview

Achieved Impressions	Clicks	Link Clicks	Post Engagement	Claim Submissions
2,991,278	14,268	5,542	6,167	61

Audiences

AUD 1

Location: U.S. + Territories
Age: 18+
Who Match: Home, House, New House, House, Home Renovation, Home Improvement, Kitchen Cabinets, West Elm, Williams-Sonoma, Crate & Barrel, CB2, Pottery Barn, among others

AUD 2

Location: U.S. + Territories
Age: 18+
Who Match: Home Depot, Lowes, Best Buy, Wayfair, Microwave Oven, Home Appliances, BSH Bosch und Siemens Hausgeräte, among others

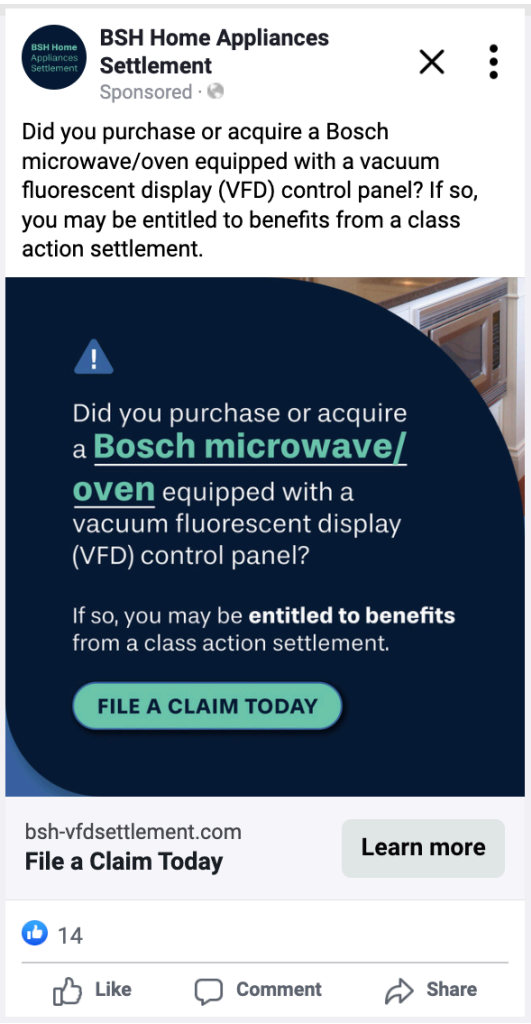
AUD 3

Location: U.S.
Age: 18+
Who Match: Lookalike

Page Preview



Ad Sample



Campaign Date Range: March 14, 2024 to April 27, 2024 | Report Date Range: March 14, 2024 to April 27, 2024

Channel Overview

Achieved Impressions	Clicks	CTR	Total Conversions
1,609,198	2,242	0.14%	0

Audiences

AUD 1

Location: U.S. + Territories
Age: 18+
Who Match: Interested in Bosch, Bosch Appliances, Microwave, Microwave Appliances, In-Market for Microwaves, Kitchen Remodels, among other related audiences

AUD 2

Location: U.S. + Territories
Age: 18+
Who Match: Home Owners, Home Ownership, CB2, Pottery Barn, Williams Sonoma, West Elm, Bassett Furniture, Crate and Barrel, among other related audiences

Ad Samples

!

Did you purchase or acquire a **Bosch microwave/oven** equipped with a vacuum fluorescent display (VFD) control panel?

If so, you may be **entitled to benefits** from a class action settlement.

FILE A CLAIM TODAY

!

Did you purchase or acquire a **Bosch microwave/oven** equipped with a vacuum fluorescent display (VFD) control panel?

If so, you may be **entitled to benefits** from a class action settlement.

FILE A CLAIM TODAY

!

Did you purchase or acquire a **Bosch microwave/oven** equipped with a vacuum fluorescent display (VFD) control panel?

If so, you may be **entitled to benefits** from a class action settlement.

FILE A CLAIM TODAY

!

Did you purchase or acquire a **Bosch microwave/oven** equipped with a vacuum fluorescent display (VFD) control panel?

If so, you may be **entitled to benefits** from a class action settlement.

FILE A CLAIM TODAY

Campaign Date Range: March 14, 2024 to April 27, 2024 | Report Date Range: March 14, 2024 to April 27, 2024

Tactic Overview

Achieved Impressions	Clicks	CTR	Phone Calls	Conversions
30,674	667	2.17%	3	12

Channel Overviews

Google Ads Search

Achieved Impressions	Clicks	CTR
6,812	432	6.34%

Microsoft Advertising (Bing)

Achieved Impressions	Clicks	CTR
23,862	235	0.98%

Search Keyword Samples

Search keyword
bosch home appliances
bosch kitchen appliances
microwave oven
bosch microwave oven
microwave lawsuit
microwave
faulty microwave oven
bosch microwave control panel
microwave settlement
electric oven

Ad Samples

Google Ads Search

Sponsored

 www.bsh-vfdsettlement.com/


Class Action Lawsuit - Bosch Display Fade Settlement

Peterson v. BSH Home Appliances Corporation. If you purchased or acquired a Bosch microwave/oven, you may be eligible.
[Submit Claim](#) · [Court Documents](#) · [FAQs](#)

Microsoft Advertising (Bing)

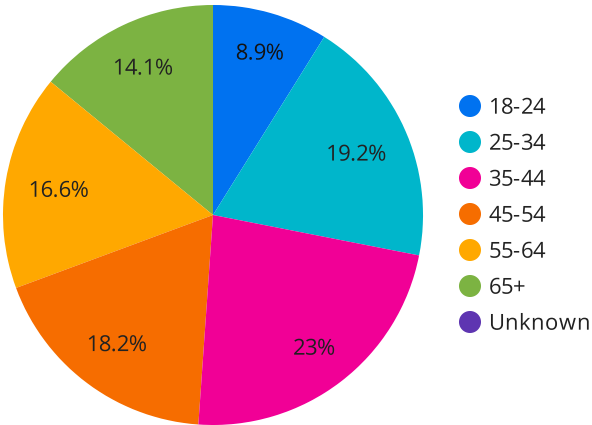
Bosch Display Fade Settlement | Display Failure Settlement | Purchased Bosch Microwave?

[www.bsh-vfdsettlement.com](#)

 Peterson v. BSH Home Appliances Corporation. If you purchased or acquired a Bosch microwave/oven, you may be eligible.

Campaign Date Range: March 14, 2024 to April 27, 2024 | Report Date Range: March 14, 2024 to April 27, 2024

Post Engagement By Age Group

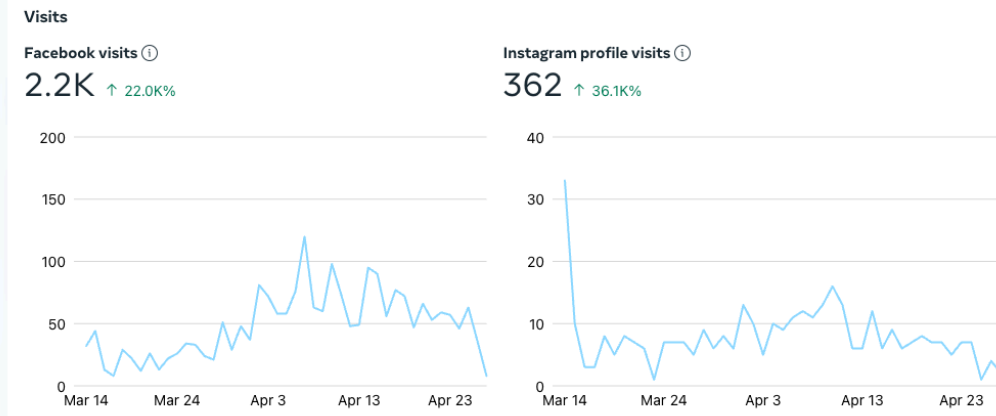
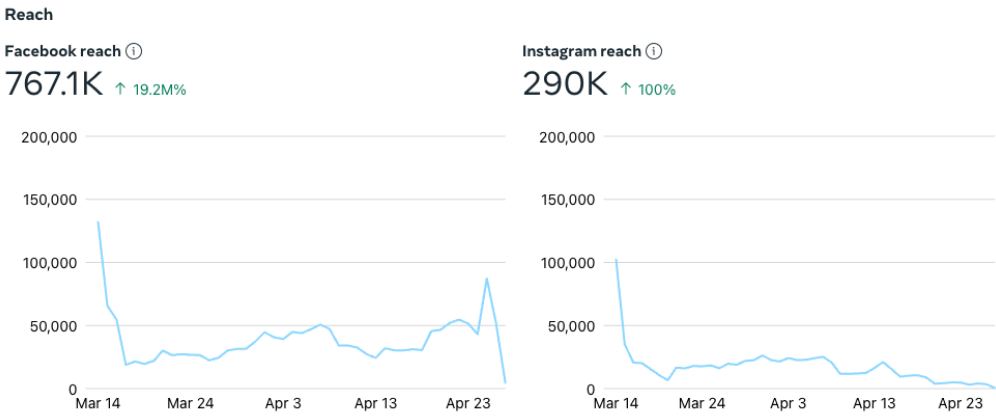


Post Engagement By Gender & Type

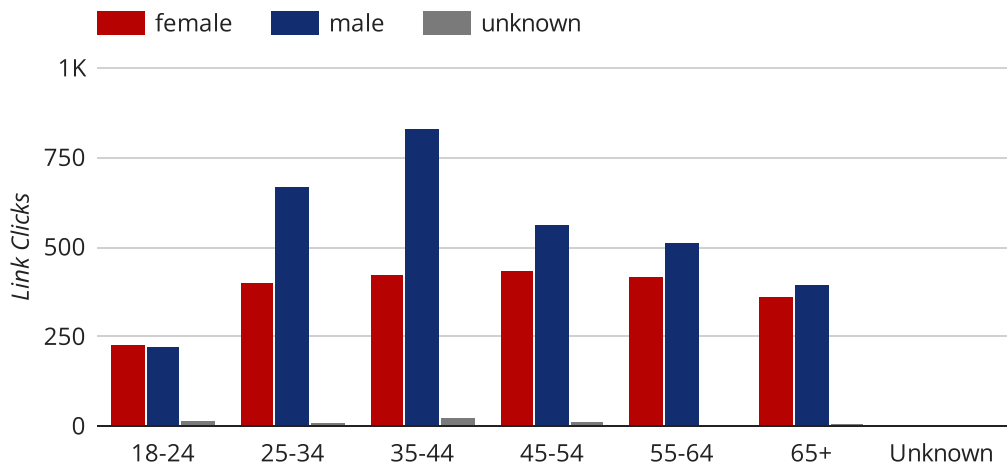
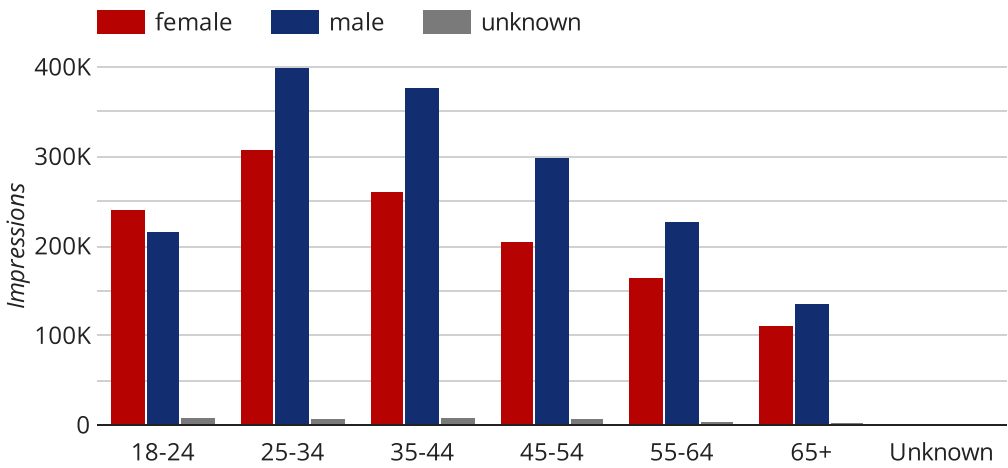
Gender ^	Post Reactions	Post Shares	Clicks	Post Engagement
female	131	12	4,841	2,470
male	238	50	9,181	3,606
unknown	12	3	246	91

Grand total	381	65	14,268	6,167
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Page Engagement Insights



Impressions & Link Clicks Demographics

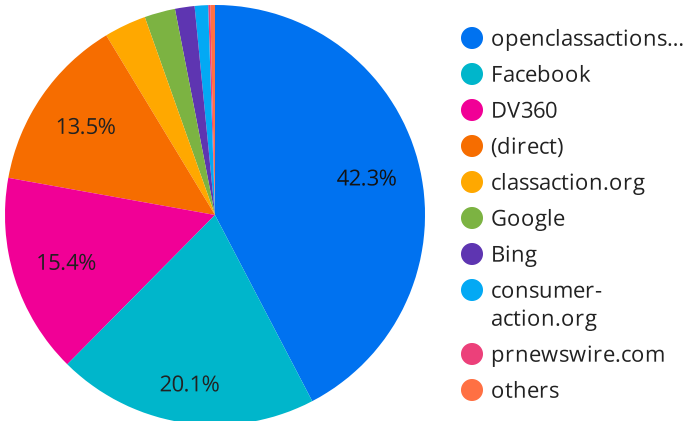


Campaign Date Range: March 14, 2024 to April 27, 2024 | Report Date Range: March 14, 2024 to April 27, 2024

Engagement Rate & New Users By User Source

	First User Source	Engagement rate	New users ▾
1.	openclassactions.com	85.67%	7,842
2.	Facebook	15.66%	4,255
3.	DV360	6.78%	3,133
4.	(direct)	61.92%	1,983
5.	classaction.org	77.2%	574
6.	Google	60.41%	439
7.	Bing	71.89%	313
8.	consumer-action.org	82.33%	203
9.	injuryclaims.com	82.35%	28
10.	Baidu	0%	24

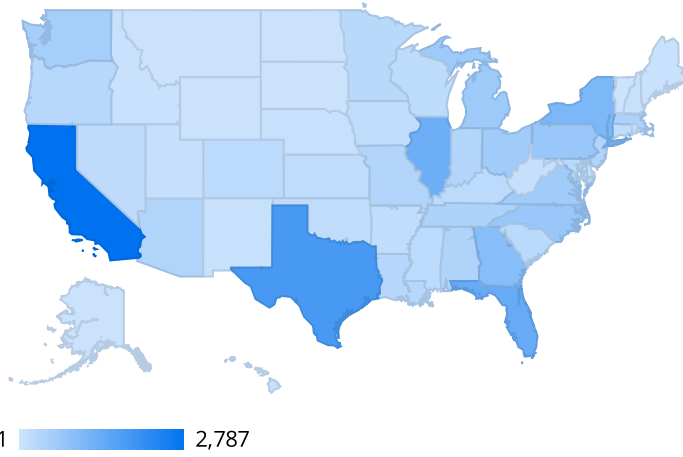
Sessions By First User Source



Top Pages By Count of Sessions

	Page title	Sessions ▾
1.	Home Page - Peterson et al. v. BSH Home Appliances Corporation	12,784
2.	Claim Form Log In - Peterson et al. v. BSH Home Appliances Corp...	10,798
3.	Claim Form - Peterson et al. v. BSH Home Appliances Corporation	10,634
4.	Thanks - Peterson et al. v. BSH Home Appliances Corporation	2,012
5.	Documents - Peterson et al. v. BSH Home Appliances Corporation	487

Sessions By State



Total Users & New Users Over Time

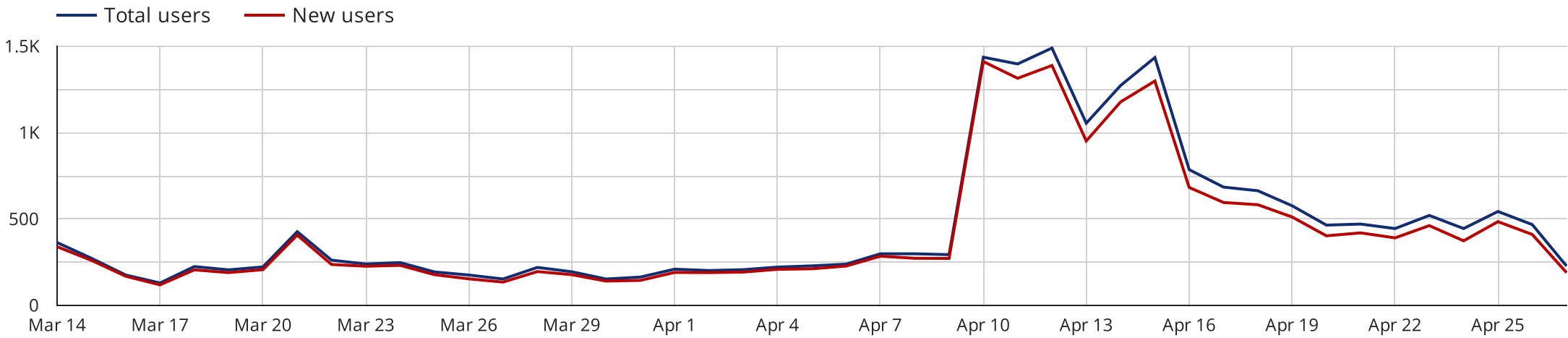


EXHIBIT G

Did you purchase or acquire a Bosch-manufactured microwave/oven equipped with a vacuum fluorescent display (VFD) control panel? If so, you may be entitled to benefits from a class action settlement.

Announced by CPT Group, Inc.

IRVINE, Calif., - CPT Group, Inc., announces a proposed Settlement in a class action lawsuit called *Peterson et al. v. BSH Home Appliances Corporation*. Case No. 2:23-cv-00543-RAJ, United States District Court Western District of Washington at Seattle (the “Settlement”).

What is this about? A Settlement has been reached in a class action lawsuit against BSH Home Appliances Corporation (“Bosch” or “Defendant”) regarding microwave/oven combination appliances equipped with a vacuum fluorescent display (“VFD”) control panel (the “Class Products”).

Who is affected? The “Settlement Class” includes all persons in the United States and its territories who either (a) purchased a new Class Product, or (b) acquired a new Class Product as part of the purchase or remodel of a home, or (c) received as a gift, from a donor meeting those requirements, a new Class Product not used by the donor or by anyone else after the donor purchased the Class Product and before the donor gave the Class Product to the Settlement Class Member, during the Class Period.

What does the Settlement provide? The Settlement provides monetary relief and/or an extended service plan benefit.

Settlement Benefits: Bosch will pay a maximum of up to \$2,000,000 (“Settlement Fund”) for reimbursement of sufficiently documented out-of-pocket costs up to \$400.00 per claim with proof related to the Past Display Failure; and/or an extended service plan benefit of three (3) years from the date of purchase, wherein Bosch would replace any VFD control panel that experienced a Display Failure. In addition, Service Awards to the Class Representatives, Notice and Administration to the Settlement Administrator, and Attorney’s Fees to Class Counsel will be paid from Settlement Fund. If the total amount of refund claims exceeds the funds available to the Class, the amount paid on each claim will be reduced *pro-rata*.

How do I file a claim? You must complete and submit a Claim Form, including required documentation, either on-line or via U.S. Mail by **September 3, 2024**, for a Past Display

Failure or within 90 days of experiencing a Future Display Failure. Claim Forms are available for download and online submission at www.BSH-VFDSettlement.com.

What are my other options?

Exclude Yourself: If you decide to exclude yourself (or “opt-out”) of this Settlement, you will keep the right to sue Defendant in a separate lawsuit related to the subject matter of the claims this Settlement resolves, but you give up the right to receive a Settlement Benefit from this Settlement. Requests for Exclusion must be sent to the Settlement Administrator with a postmark no later than **April 25, 2024**.

Object: If you do not opt out of the Settlement, you may object to it by writing to the Court about why you do not like the Settlement. Your objection must be filed or postmarked on or before **April 25, 2024**.

Do Nothing: If you do nothing, you will give up your right to sue or continue to sue Defendant for the claims in this case.

What happens next? The Court will hold a hearing on **June 13, 2024**, to consider whether the Settlement is fair, adequate, and reasonable, and whether it should be finally approved. You may appear at the hearing in person or through your attorney at your own cost, but you are not required to do so.

How do I get more information? For more information and to view the full notice or Settlement Agreement, visit the Settlement Website at www.BSH-VFDSettlement.com. You may also contact the Settlement Administrator toll-free at 1-888-919-3856, by email at BSH-VFDSettlement@CPTGroup.com or by writing to *Bosch Microwave/Oven Settlement*, c/o CPT Group, Inc., 50 Corporate Park, Irvine, CA 92606.

PLEASE DO NOT CONTACT THE COURT OR THE COURT CLERK’S OFFICE